

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Carol Merchiore

Debtor

Case No.: 17-16965 AMC

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. On or about April 17th, 2017, the Debtor's Chapter 13 Plan was confirmed by this Honorable Court.
2. The Debtor unfortunately was not able to become current on her pre-petition residential real estate taxes owed to Bucks County Pennsylvania directly.
3. The Debtor contacted her undersigned Counsel when she was informed that her home was at risk for a Tax Sale on September 17th, 2018 for delinquent real estate taxes.
4. Debtor's Counsel contacted Bucks County, to arrange a Proof of Claim to be filed, in order for the Debtor to attempt to cure these real estate taxes through a modified Chapter 13 Plan.
5. The Debtor by and through her Counsel has drafted a proposed modified plan. Please see attached proposed modified plan marked as "Exhibit A" and incorporated herein.
6. This modified Chapter 13 Plan is feasible and will allow the Debtor keep her home and successfully complete her Bankruptcy.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above stated reasons.

Dated: August 17, 2018

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
Philadelphia, PA 19107